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Attorneys for Non-Party  
Nokia Solutions and Networks US LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

HUAWEI TECHNOLOGIES CO., LTD.,  
HUAWEI DEVICE USA, INC., and  
HUAWEI TECHNOLOGIES USA, INC.,

Plaintiff(s)/Counterclaim  
Defendants,

vs.

SAMSUNG ELECTRONICS CO., LTD,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Defendants / Counterclaim-  
Plaintiffs

And

SAMSUNG RESEARCH AMERICA, INC.,

Defendant,

v.

HISILICON TECHNOLOGIES CO., LTD.,

Counterclaim-Defendant.

Case No.: 3:16-cv-2787-WHO

**DECLARATION OF RYAN W.  
KOPPELMAN IN SUPPORT OF  
SAMSUNG'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS UNDER  
SEAL [D.I. 333]**

1 I, Ryan W. Koppelman, declare as follows:

2 1. I am an attorney with the law firm of Alston & Bird LLP, counsel for Non-Party Nokia  
3 Solutions and Networks US LLC (“Nokia”), in connection with the above-captioned action. I am a  
4 member in good standing of the State Bar of California and am admitted to practice before this Court.  
5 Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if called  
6 as a witness, I could and would testify thereto. I am filing this declaration pursuant to Civil Local  
7 Rule 79-5(e)(1) in support of Samsung’s “Administrative Motion To File Under Seal” filed on July 3,  
8 2018 (D.I. 333) (“Samsung’s Motion To Seal”).

9 2. On July 11, 2018, counsel for Samsung informed Nokia that information it produced  
10 in this case was included or discussed in certain exhibits to its motion to seal. Nokia was not explicitly  
11 mentioned in Samsung’s motion, nor did it have knowledge that its information were filed with the  
12 Court prior to this date.

13 3. I have reviewed certain portions of exhibits to Samsung’s Motion to Seal—specifically,  
14 paragraphs 110-121 of Exhibit R (D.I. 333-38). These Exhibits cite repeatedly to documents and  
15 deposition testimony that were designated by Nokia as “Highly Confidential – Attorneys’ Eyes Only”  
16 pursuant to Protective Order (D.I. 110). More specifically, these Exhibits contain sensitive,  
17 confidential business information belonging to Nokia and Motorola, which was in Nokia’s possession  
18 subject to a nondisclosure agreement between the Parties and as result of a subsequent acquisition by  
19 Nokia of a Motorola business unit. The deposition testimony cited is of Dr. Ghosh who is a former  
20 Motorola employee and current Nokia employee who transitioned as part of business unit acquisition.  
21 The documents and testimony are related to Nokia’s confidential business practices, including  
22 technical information that has not been publicly disclosed and details regarding its relationships with  
23 business partners.

24 4. I am further informed and believe that the public disclosure of this information would  
25 reveal sensitive, confidential business information pertaining to Nokia and would create a risk of  
26 significant competitive injury and particularized harm to Nokia. I am informed and believe that Nokia  
27 protects such information as trade secrets and does not generally disclose this information publicly  
28

1 because public disclosure of this confidential information would allow Nokia's competitors to gain  
2 competitive information about Nokia's technology, business methods, and supplier relationships.  
3 Accordingly, Nokia requests the sealing of paragraphs 110-121 of Exhibit R.

4 5. I previously filed a declaration on behalf of Nokia in support of a motion to seal filed  
5 by Huawei, which contained similar Highly Confidential information belonging to Nokia. (D.I. 182).  
6 The Court granted that motion to seal. (D.I. 188).

7 6. For the foregoing reasons, Nokia requests that the Court grant Samsung's  
8 Administrative Motion to Seal with respect to the above-described exhibits.

9  
10 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
11 and correct to the best of my knowledge.

12 Executed this 12<sup>th</sup> day of July, 2018 in East Palo Alto, California.

13  
14 /s/ Ryan W. Koppelman  
Ryan W. Koppelman